

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-09900014-2012**
Application Received: **November 2, 2011**
Plant Identification Number: **099-00014**
Permittee: **Columbia Gas Transmission, LLC**
Facility Name: **Kenova Compressor Station**
Mailing Address: **1700 MacCorkle Avenue, SE, Charleston, WV 25314**

Revised: *N/A*

Physical Location: Kenova, Wayne County, West Virginia
UTM Coordinates: 360.9 km Easting • 4,248.0 km Northing • Zone 17
Directions: Traveling I-64 West from Charleston, take the Kenova-Ceredo exit for US Route 52. Follow US 52 South approximately 2 miles to Route 1 intersection. The station is located on Route 1 near the intersection of Route 1 and Route 52.

Facility Description

The Kenova Station is a natural gas transmission and oil and gas production facility covered by Standard Industrial Code (SIC) 4922. The station has the potential to operate seven (7) days per week, twenty-four (24) hours per day. The station consists of four (4) 2000-hp and four (4) 1100-hp natural gas fired reciprocating compressor engines, a wastewater evaporation injection system and numerous storage tanks of various sizes. On-site support equipment includes one (1) 500-hp emergency generator, one (1) 0.275 MMBtu/hr heating system boiler and one (1) 1.5 MMBtu/hr line heater. The facility also has a 1,000 gallon mercaptan tank with flare to control odor.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2011 Actual Emissions
Carbon Monoxide (CO)	799.6	448.7
Nitrogen Oxides (NO _x)	1338.6	84.68
Particulate Matter (PM ₁₀)	13.28	8.61
Total Particulate Matter (TSP)	13.28	8.61
Sulfur Dioxide (SO ₂)	0.36	0.22
Volatile Organic Compounds (VOC)	44.2	29.43
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2011 Actual Emissions
Formaldehyde	20.50	7.41
Other HAPs	4.45	0.0
Total HAPs	24.94	7.41

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit 800 tons per year of Carbon Monoxide, 1339 tons per year of Nitrogen Oxides, and 20.50 tons per year of Formaldehyde. Due to this facility's potential to emit over 100 tons per year of criteria pollutant and over 10 tons per year of a single HAP, Columbia Gas Transmission, LLC is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:

45CSR2	PM limits for Indirect Heat Exchangers
45CSR6	Open burning prohibited
45CSR10	SO ₂ emission limits
45CSR11	Standby plans for emergency episodes
45CSR13	Construction Permits
WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting
45CSR30	Operating permit requirement
45CSR34	Emission Standards for HAPs
40 C.F.R. Part 61	Asbestos inspection and removal
40 C.F.R. Part 82, Subpart F	Ozone depleting substances

40 C.F.R. Part 63, Subpart ZZZZ

National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

State Only:

45CSR4

No objectionable odors.

45CSR17

Prevent And Control Particulate Matter Air Pollution From Materials. Handling, Preparation, Storage And Other Sources Of Fugitive Particulate Matter

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2251C	May 3, 2007	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s).

Determinations and Justifications

This is a renewal permit. This facility was previously registered under General Permit R30-NGGP-2007 for Natural Gas Compressor Facilities. The Division of Air Quality did not renew the general permit for natural gas compressor facilities, therefore this facility's renewal will be issued as a source-specific permit. The source-specific permit includes various requirements which are potentially applicable to natural gas compressor stations. The applicable requirements column in the Section 1.0 Emission Units Table of the permit indicates which of the requirements in Sections 2.0 through 24.0 are applicable to each emissions unit.

40 CFR Part 63, Subpart ZZZZ – Engines E01-E04 are existing, non-emergency, spark-ignition, 2-cycle, lean-burn engines greater than 500-hp constructed before December 19, 2002 and located at a major source of HAPs, therefore these engines have no requirements in accordance with 40 CFR §§63.6590(b)(3)(i) and 63.6600(c).

Engines E05-08 are existing, non-emergency, spark-ignition, 4-cycle rich-burn engines greater than 500-hp constructed before December 19, 2002. These engines are subject to 40 CFR Part 63, Subpart ZZZZ and must be in compliance by June 15, 2007 in accordance with 40 CFR §63.6595(a). The requirements are listed in the Section 1.0 Emission Units Table of the permit.

Engine G3 is an existing, emergency, spark-ignition, 4-cycle lean burn engine less than or equal to 500-hp. It was constructed in 2003 before the June 6, 2006 applicability date for existing emergency SI engines. This engine is subject to 40 CFR Part 63, Subpart ZZZZ and must be in compliance by October 19, 2013 in accordance with 40 CFR §63.6595(a). The requirements are listed in the Section 1.0 Emission Units Table of the permit.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

According to 45CSR§2-11.1 the boiler and heater are exempt from MRR (Monitoring, recordkeeping and reporting) because they are less than 10 mmBtu/hr.

WVDEP has determined that 45CSR10 does not apply to gas fired engines. Also 45CSR10 is not applicable to the facility boiler and heater because they are less than 10 mmBtu/hr.

45CSR21; *To Prevent and Control Air Pollution from the Emission of Volatile Organic Compounds*: All storage tanks at Kenova station are below 40,000 gallons in capacity; hence 45CSR§21-28 is not applicable. Kenova station is not engaged in the extraction or fractionation of natural gas, hence, 45CSR§21-29 is not applicable.

45CSR27; *To Prevent and Control the Emissions of Toxic Air Pollutants*: Natural gas is included as a petroleum product and contains less than 5% benzene by weight. 45CSR§27-2.4 exempts equipment “used in the production and distribution of petroleum products providing that such equipment does not produce or contact materials containing more than 5% benzene by weight.”

40 C.F.R. 60 Subparts Dc; *Standards of Performance for Steam Generating Units* – The boiler and heater at this facility are less than 10 mmBtu/hr; Hence Subpart Dc is not applicable.

40 C.F.R. 60 Subparts K,Ka; *Standards of Performance for Storage Vessels for Petroleum Liquids* - All tanks at Kenova station are below 40,000 gallons in capacity.

40 C.F.R. 60 Subpart Kb; *Standards of Performance for Volatile Organic Liquid Storage Vessels* - All tanks at Kenova station are below 75m³ in capacity.

40 C.F.R. 60 Subpart KKK; *Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plant* - Kenova station is not engaged in the extraction or fractionation of natural gas liquids from field gas, the fractionation of mixed natural gas liquids to natural gas products, or both.

40 C.F.R. 60 Subpart IIII *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* – There are no compression ignition engines at the facility.

40 C.F.R. 60 Subpart JJJJ *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines* – Engines at the facility were constructed, reconstructed, or modified prior to June 12, 2006.

40 C.F.R. 60 Subpart GG *Standards of Performance for Stationary Gas Turbines* – There are no turbines at the facility.

40 C.F.R. 60 Subpart KKKK *Standards of Performance for Stationary Combustion Turbines* – There are no turbines at the facility.

40 C.F.R. 63 Subpart DDDDD; Boiler MACT - The boiler and heater at this facility use gaseous fuel and are less than 10 mmBtu/hr; hence, Subpart DDDDD is not applicable per 40 CFR §63.7506(c)(3).

40 C.F.R. 63 Subpart YYYYY *National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines* – There are no turbines at the facility.

40 C.F.R. 63 Subpart HHH *National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities* – The facility does not have a glycol dehydration unit and is therefore not subject to the requirements of this subpart.

[40 C.F.R. 64](#) – The engines, boiler, and heater do not have any add-on control; therefore, in accordance with 40 C.F.R §64.2(a), CAM is not applicable to this facility. The Mercaptan tank is not a major source; therefore, CAM is not applicable per 40 C.F.R §64.2(a)(3).

Greenhouse Gas Permitting - This is a renewal Title V permit and there have been no modifications that would have triggered a PSD permit. Therefore, there are no applicable GHG requirements.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: September 15, 2012

Ending Date: October 15, 2012

All written comments should be addressed to the following individual and office:

Bobbie Scroggie
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Bobbie Scroggie
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1225 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.